

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ISRAEL GARCIA, individually and on
behalf of a class of similarly situated individuals,

Plaintiff,

No.: 16-CV-02574-MJD-BRT

v.

TARGET CORPORATION, a Minnesota
corporation,

**MOTION FOR PRELIMINARY
APPROVAL OF CLASS
ACTION SETTLEMENT**

Defendant.

**PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Israel Garcia (“Plaintiff”), through his undersigned counsel, and pursuant to Fed. R. Civ. P. 23 and Local Rule 7-1, hereby moves for preliminary approval of the Settlement Agreement reached with Target Corporation (“Target”) in this matter for claims brought pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227, *et seq.* By this Motion and the concurrently filed memorandum of law in support, Plaintiff seeks preliminary approval of the Settlement Agreement, proposed claims procedure, and the proposed form and method of class notice pursuant to Federal Rule of Civil Procedure 23(e).

Plaintiff also respectfully requests that the Court appoint Plaintiff as Class Representative and Myles McGuire, Evan M. Meyers, Eugene Y. Turin of McGuire Law,

P.C.; Daniel M. Hutchinson of Lieff Cabraser Heimann & Bernstein, LLP; Aaron Siri of Siri Glimstad LLP; Jarrett L. Ellzey of Hughes Ellzey, LLP; and Robert K. Shelquist of Lockridge Grindal Nauen, PLLP, as Class Counsel.

Dated: June 21, 2019

Respectfully submitted,

ISRAEL GARCIA, individually and on
behalf of a Class of similarly situated
individuals

By: /s/ Eugene Y. Turin

One of his Attorneys

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